

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,) No. CR20-222-RAJ
Plaintiff,)
v.) UNOPPOSED MOTION TO
JASON DESIMAS,) CONTINUE PRETRIAL MOTIONS
Defendant.) DUE DATE

Jason DeSimas, through his attorneys Sara Brin and Corey Endo, respectfully submits the following motion to continue the pretrial motions due date in this matter for three weeks, from October 21, 2021, to November 11, 2021. Assistant United States Attorney Rebecca Cohen does not oppose this request, which is made for the following reasons.

Jason DeSimas and three co-defendants are each charged with three counts of committing a hate crime on December 8, 2018, in violation of 18 U.S.C. §§ 2 and 249(a)(1), and one count of making a false statement, in violation of 18 U.S.C. § 1001. The Court has scheduled trial to begin on December 6, 2021, with pretrial motions due on October 21, 2021.

Mr. DeSimas has been in custody since he self-surrendered on December 20, 2001. Co-defendant Daniel Dorson has pleaded guilty and was released pursuant to an appearance bond on April 29, 2001. Dkt. 78. The other two co-defendants, Jason

1 Stanley and Randy Smith, are in custody in different jurisdictions and have not yet
2 arrived in the Western District of Washington. Mr. Stanley has an initial appearance set
3 for November 19, 2021 in this district, but to the best of defense counsel's knowledge,
4 Mr. Smith has no estimated date of arrival in this district. Dkt. 86.

5 The parties are presently engaged in plea negotiations, and the three-week
6 continuance will allow the parties to continue in those discussions. Additionally,
7 depending on when the co-defendants arrive in this district, the government or their
8 counsel will likely seek a continuance of the presently set trial date. An extension of
9 Mr. DeSimas's pretrial motions deadline will provide the parties with a better
10 understanding of the trial date before filing motions.

11 For these reasons, the defense respectfully asks the Court to continue the pretrial
12 motions deadline from October 21, 2021, to November 11, 2021.

13 DATED this 14th day of October 2021.

14 Respectfully submitted,

15 *s/ Corey Endo*
16 *s/ Sara Brin*
17 Assistant Federal Public Defenders
Attorneys for Jason DeSimas